

BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

IN RE: PETITION OF THE SOUTH)	
CAROLINA TELEPHONE COALITION)	Docket No. 2015-290-C
FOR A DETERMINATION THAT)	
WIRELESS CARRIERS ARE)	
PROVIDING RADIO-BASED LOCAL)	
EXCHANGE SERVICES IN SOUTH)	
CAROLINA THAT COMPETE WITH)	
LOCAL TELECOMMUNICATIONS)	
SERVICE PROVIDED IN THE STATE)	

**FRONTIER COMMUNICATIONS OF THE
CAROLINAS, LLC**

PETITION TO INTERVENE

Petitioner Frontier Communications of the Carolinas, LLC ("Frontier"), an incumbent local exchange provider contributor and recipient of State USF, hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Frontier to intervene in the above-referenced Docket with full rights to participate as a party of record. In support of its Petition, Frontier submits the following to the Commission:

1. Frontier is a facilities-based incumbent local exchange provider in South Carolina. Frontier seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests.

2. On August 12, 2015, the South Carolina Telephone Coalition and its individual member companies ("SCTC") filed a Petition for a determination that wireless carriers, who offer retail wireless services in South Carolina ("State"), are providing radio-based local exchange services in South Carolina that compete with local

telecommunications service provided in the State.

3. Frontier's request to intervene is timely made and filed as the Commission established a deadline of September 18, 2015 for any interested party to this matter to file and make such petition to intervene.

4. Frontier also receives funds from the state universal service fund ("State USF"). To the extent the Commission decides it would be appropriate to consider the issues raised by SCTC concerning the USF and related matters in the context of this docket, Frontier also has a direct and substantial interest in the subject matter of the Petition in this matter.

5. While Frontier has not fully developed a final position at this time, Frontier believes that its participation in this proceeding is essential to protect its interests and ensure a full and fair consideration of the issues raised in this proceeding.

6. Granting this Petition will not cause any undue delay, and it will not prejudice any party to this proceeding.

7. Correspondence and communications to Frontier with respect to this proceeding should be directed to undersigned counsel and Frontier regulatory contact:

C. Jo Anne Wessinger Hill, Esquire
Steven W. Hamm, Esquire
RICHARDSON, PLOWDEN & ROBINSON, P.A.
P.O. Drawer 7788 (1900 Barnwell Street, 29201)
Columbia, South Carolina 29202
803-771-4400
803-771-0016 facsimile
Email: jhill@richardsonplowden.com
swhamm@richardsonplowden.com

Susan Miller
Frontier Communications
3833 S Alston Avenue
Durham, NC 27713
E-Mail: susan.miller@ftr.com
Telephone: (919) 941-3411
Facsimile: (919) 544-0963

8. Frontier is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record.

WHEREFORE, based upon the foregoing, Frontier respectfully requests that the Commission grant this Petition to Intervene as a formal party of record, permit its intervention to protect its interests and to allow Frontier to take such positions as it deems advisable, direct any and all parties of record provide it with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding, and grant all such other relief that deems just and proper.

[signature page to follow]

Respectfully submitted this 3rd day of September, 2015.

FRONTIER COMMUNICATIONS OF
THE CAROLINAS, LLC

By: 

C. Jo Anne Wessinger Hill, Esquire
Steven W. Hamm, Esquire
RICHARDSON, PLOWDEN & ROBINSON, P.A.
P.O. Drawer 7788 (1900 Barnwell Street, 29201)
Columbia, South Carolina 29202
803-771-4400
803-771-0016 facsimile
Email: jhill@richardsonplowden.com
swhamm@richardsonplowden.com

September 3, 2015

Columbia, South Carolina.

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET 2015-290-C**

IN RE:

PETITION OF THE SOUTH CAROLINA)
TELEPHONE COALITION FOR A)
DETERMINATION THAT WIRELESS)
CARRIERS ARE PROVIDING RADIO-)
BASED LOCAL EXCHANGE)
SERVICES IN SOUTH CAROLINA)
THAT COMPETE WITH LOCAL)
TELECOMMUNICATIONS SERVICE)
PROVIDED IN THE STATE)
_____)
)

CERTIFICATE OF SERVICE

This is to certify that I, Sonya Hancock, an employee of the firm of Richardson Plowden & Robinson, PA, have on September 31st, 2015, served one (1) copy of the foregoing document, filed on behalf of Frontier Communications of the Carolinas, Inc. in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service (unless otherwise specified), first class postage prepaid and affixed thereto, and addressed as follows:

**VIA ELECTRONIC MAIL SERVICE AND
U.S. MAIL**

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
South Carolina Telephone Coalition
McNair Law Firm, PA
Post Office Box 11390
Columbia, South Carolina 29211

**VIA ELECTRONIC MAIL SERVICE
AND U.S. MAIL**

Jeffrey M. Nelson, Esquire
Andrew M. Bateman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

**VIA ELECTRONIC MAIL SERVICE AND
U.S. MAIL**

The Honorable Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
**The Public Service Commission of South
Carolina**
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29210

**VIA ELECTRONIC MAIL SERVICE
AND U.S. MAIL**

Charles L.A. Terreni, Esquire
South Carolina Telephone Coalition
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201

VIA ELECTRONIC MAIL SERVICE

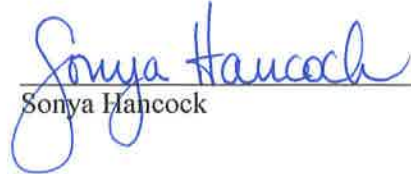
AND U.S. MAIL

Scott Elliott, Esquire
United Telephone Company d/b/a Century Link
ELLIOTT & ELLIOTT, P.A.
1508 Lady Street
Columbia, South Carolina 29201

VIA ELECTRONIC MAIL SERVICE

AND U.S. MAIL

Burnet R. Maybank, III, Esquire
Windstream South Carolina, LLC,
and Windstream Nuvox, LLC
1230 Main Street, Suite 700
Columbia, South Carolina 29201



Sonya Hancock

September 3, 2015
Columbia, South Carolina